

UNITED STATES DCISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
GOVERNMENT EMPLOYESS INSURANCE CO., GEICO
INDEMNITY CO., GEICO GENERAL INSURANCE CO.,
and GEICO CASUALTY CO.,

Plaintiffs,

-against-

MICHAEL D. GREEN, M.D., CLIFFORD BEINART, M.D.,
VISTA MEDICAL DIAGNOSTIC IMAGING, P.C., TOTAL
GLOBAL MEDICAL, P.C., IMAGING ASSOCIATES OF
FIVE BOROUGHES, L.L.C., FIVE COUNTY IMAGING
HOLDINGS, L.L.C., ASAF YEVDAYEV, RAPUZZI,
PALUMBO, & ROSENBERGER, P.C., PATRICIA
RAPUZZI and DANNY MONTANEZ.

Defendants.

**REPLY TO
PLAINTIFF'S FIRST
REQUEST FOR
PRODUCTION OF
DOCUMENTS TO
DEFENDANT
DANNY MONTANEZ**

Civil Action No.:
10-CV-2671

-----X
Defendant, Danny Montanez, hereby replies to Plaintiff's First Request for
Production of Documents, pursuant to Rule 26 and 34 of the Federal Rules of Civil
Procedure and Local Civil Rule 26.3, as follows:

1. Defendant, Danny Montanez, does not have the requested documents in
his custody, possession or control.
2. Defendant, Danny Montanez, does not have the requested documents in
his custody, possession or control.
3. Defendant, Danny Montanez, does not have the requested documents in
his custody, possession or control.
4. Defendant, Danny Montanez, hereby objects to production of Federal and
New York State income tax returns prepared since 2001 as production of said documents
are not reasonably calculated to lead the discovery of admissible evidence.

5. Defendant, Danny Montanez, hereby objects to production of all federal and state quarterly payroll tax returns prepared and/or filed by an entity associated with him as production of said documents are not reasonably calculated to lead the discovery of admissible evidence.

6. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

7. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

8. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

9. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

10. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

11. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

12. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

13. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

14. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

15. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

16. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

17. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

18. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

19. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

20. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

21. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

22. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

23. Defendant, Danny Montanez, does not have the requested documents in his custody, possession or control.

24. Defendant, Danny Montanez, does not have the requested documents.

25. Defendant, Danny Montanez, does not have the requested documents.

26. Defendant, Danny Montanez, does not have the requested documents.

27. Defendant, Danny Montanez, does not have the requested documents.

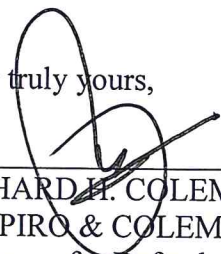
28. Defendant, Danny Montanez, does not have the requested documents.

29. At the present, defendant, Danny Montanez, does not have in his custody, possession or control any evaluations or analyses by a document examiner/expert but will disclose such information to plaintiffs' counsel upon receipt thereof.

30. See Defendant, Danny Montanez's Reply to First Set of Interrogatories.

Dated: N. Massapequa, NY
April 11, 2012.

Very truly yours,



RICHARD H. COLEMAN, ESQ. (RHC-7193)
SHAPIRO & COLEMAN, P.C.
Attorneys for Defendant-MONTANEZ
727 N. Broadway
N. Massapequa, NY 11758
(516) 798-7800

TO:

IMAGING ASSOCIATES OF FIVE BOROUGHES, LLC, FIVE COUNTY IMAGING
HOLDINGS, LLC AND ASAF YEVDAYEV
119-60 Metropolitan Avenue
Kew Gardens, NY 11415

RIVKIN RADLER, LLP
Attorney for Plaintiff
926 RXR Plaza
Uniondale, NY 11556

Attn: Max Gershenoff, Esq.

RICHARD M. COLEMAN
Notary Public, State of New York
No. 02CO4672007
Qualified in Nassau County
Commission Expires March 30, 2014